

Before the Federal Communications Commission  
Washington, D.C. 20554

In the Matter of Notice of Proposed Rulemaking  
18 FCC 13187, 13188 (2003)

And

Service Rules for the Advanced Wireless Services  
H Block---Implementing Section 6401 of the  
Middle Class Tax Relief and Job Creation Act of  
2012 Related to the 1915-1920 MHz and  
1995-2000 MHz Bands ~53 footnote 95

To: Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

Comment Filed by:  
Charyl Zehfus, N6158 N. 61<sup>st</sup> Street, Sheboygan, WI 53083

FCC 12-152  
ET Docket No. 03-137  
WT Docket No. 12-357

My name is Charyl Zehfus and I live at N6158 N. 61<sup>st</sup> Street, Sheboygan, WI.  
I am a retired librarian who appreciates technology and access and connecting. But I believe the technology must be proven to be safe, and certainly not have thousands of studies showing harmful effects, such as the case with pulsed radiofrequency (RF).

Medical doctors/professionals, who care about health, want a protective standard. In July 2012 the American Academy of Pediatrics asked the FCC to investigate the biological damage research in order to adopt protective non-thermal standards based on biological impacts. FCC RF guidelines only pertain to thermal effects for a brief exposure on a large male. Children, pregnant women, elderly and the ill are not protected from thermal effects. And no person in the U.S. is protected from numerous biological impacts of non-thermal exposures. <http://www.scribd.com/doc/104230961/American-Academy-of-Pediatrics-letter-to-the-FCC>

The American Academy of Environmental Medicine warns also warns about genetic, cancers, blood-brain barrier and other impacts of the reckless wireless proliferation on human health.  
[http://www.aeonline.org/emf\\_rf\\_position.html](http://www.aeonline.org/emf_rf_position.html)

Cell phones and towers, DECT phones, smart utility meters already create an RF soup here that is further expanded by countywide wireless broadband, a technology service this FCC report celebrates. I can tell you a thing or two about wireless broadband. Before it was expanded to reach throughout my whole county the ambient RF in the house was 4-9µW/m<sup>2</sup> and after the expansion it exploded to 55-

>113 $\mu$ W/m<sup>2</sup>. This new broadband pulse continues 24/7 on every level of the house and can even be heard (sounds like WiFi on steroids) on home wiring. No such sound was there before upon using the HFE35C Gigahertz Analyzer. The wireless broadband radiation is 100% involuntary to my family. I, myself, get sick in places with WiFi and do not use a cell phone or microwave oven. Now the FCC's guidelines have forced this additional emission into my home against my will with detrimental effects. Worldwide, people are getting ill as RF levels rise – and non-thermal impacts take a toll.

Non-thermal impacts were already shown in over 2000 studies compiled for the U.S. military by Zory R. Glaser in the 1970s. <http://www.magdahavas.com/category/from-zorys-archive/>

The updated 2012 BioInitiative Reports cites another 1800+ recent studies showing damage to DNA, cellular repair function, heart electrical functions and other serious effects.  
<http://www.bioinitiative.org/>

One particular recent study deserves special mention here:

Fetal brain damage from non-thermal RF

<http://www.ncbi.nlm.nih.gov/pubmed/22268709>

Please do not expand spectrum and wireless broadband in light of this serious information. New generations' DNA could be damaged (and it cannot be repaired), plus unnecessary disease and deaths will occur. Expanding wireless coverage will also leave nowhere to live safely for people who prefer or require less microwave exposures. Infrastructure is useless if the technology harms and even kills the people it is supposed to serve. The FCC should use the thousands of studies available to adopt protective non-thermal RF standards based on biology, not simply engineering feats.

February 5, 2013

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Comment Filed by: Charyl Zehfus  
N6158 N. 61<sup>st</sup> Street  
Sheboygan, WI 53083  
(920)467-4853  
[wisconsinmelodygirl@yahoo.com](mailto:wisconsinmelodygirl@yahoo.com)

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ET Docket No. 03-137  
WT Docket No. 12-357

February 4 , 2013

AFFIDAVIT OF Angela Flynn  
State of Hawai'i

Kaua'i County

I, Angela Flynn, attest that my statements are true to the best of my knowledge.

Comment round for ET Docket No. 03-137 and WT Docket No. 12-357.

1. My name is Angela Flynn. My address is 1090 Kealoha Road, Kapa'a, HI 96746.

2. I am a community organizer/public health advocate. My health has been adversely effected by RF/MW exposure at levels that are permitted by the FCC MPE guidelines. I realized this while living in a home 300 feet from a cell tower. I found I could not sleep for more than four hours a night; suffered memory loss; suffered creaky joints; and, suffered from a whole body ache. I now go to great measures to minimize exposure to RF/MW in order to keep myself healthy. I have removed wireless transmitters from my home, utilized RF/MW shielding to keep outside sources from trespassing into my home and limit my time in the public at high exposure events.

I have been doing my own research on electromagnetic radio frequency radiation since 2007. I discovered that there is a large body of evidence on the harmful effects of RF/MW at levels currently deemed safe and that millions of people all over the world have been injured by RF/MW exposures at these levels.

3. The Commission's RF safety rules need to be revised in order to comply with its proposal "to amend its rules to 'ensure that the public is appropriately protected from any potential adverse effects from RF/MW exposure.' The Rules need to be based on the findings of the epidemiological, in vitro and in vivo studies to date that provide evidence of adverse biological harm from RF/MW exposures at levels below the FCC Maximum Permissible Exposure (MPE) Guidelines.

4. There is a large body of evidence from studies indicating that RF/MW is biologically active at levels far below the FCC MPE Guidelines. See - 2012 BioInitiative Report [www.bioinitiative.org](http://www.bioinitiative.org), Potential Wireless Effects [http://www.emfwise.com/science\\_details.php](http://www.emfwise.com/science_details.php) and Science Overview <http://www.emfwise.com/science.php>.

5. All life is electrosensitive and therefore subject to harm from RF/MW exposure. The current levels of RF/MW constitutes a public health crisis and needs to be addressed immediately. Life threatening cancer, reproductive harm and debilitation are all indicated to be caused by RF/MW exposure.

6. "This is most clear with leukemia and brain tumors. But in residential studies, statistical significance increased for all kinds of cancers. And we are just beginning to have a whole body of evidence that reproductive cancers are increased by exposure."

- Dr David Carpenter, Dean of State of New York School of Public Health

**Respectfully submitted by:**

**Angela Flynn**

**1090 Kealoha Road**

**Kapa'a, HI 96746**

**808-822-3982**

**February 4, 2013**